

FILED

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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTHA BUENDIA-CHAVARRIA,

Defendant.

) INDICTMENT

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JUDGE HELMICK

CASE NO. **3:17 CR 538**

Title 18, Sections 1015(e),
1028(a)(3), 1028(a)(5), 1028A,
United States Code

COUNT 1

(Possession with Intent to Unlawfully Transfer Five or More Identification Documents)

The Grand Jury charges:

From on or about July 7, 2016, through on or about October 27, 2017, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MARTHA BUENDIA-CHAVARRIA did knowingly possess with intent to use unlawfully and to transfer unlawfully five (5) or more identification documents, not issued lawfully for the use of the Defendant, authentication features, and false identification documents, as defined in Title 18, United States Code, Section 1028(d), to wit: Social Security cards, Lawfully Admitted Permanent Resident (LAPR) cards, state driver's licenses and identification cards, state birth certificates, and Puerto Rican birth certificates, that were or appeared to be issued by or under the authority of the United

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States, and said conduct was in or affected interstate and foreign commerce, all in violation of Title 18, United States Code, Section 1028(a)(3).

COUNT 2

(Possession of Document Making Implements or Authentication Features)

The Grand Jury further charges:

On or about October 27, 2017, in the Northern District of Ohio, Western Division, Defendant MARTHA BUENDIA-CHAVARRIA, knowingly possessed document making implements and authentication features, to wit:

1. Nine (9) laptop and tablet computers, including:

Red Acer Aspire One Laptop, Model: Aspire One D255-2256, Serial Number: LUSDQ0D0740386CBE61601;

Pink and White HP laptop, Model Number: 14-Q010NR, Serial Number: 5CD41636FZ;

Yellow Samsung touchscreen tablet (Model Number: SM-T2105, Serial Number: RF2DA1MR9ZA;

Blue Windows Brand Tablet;

Black Compaq Laptop, Model Number: C058-B10NR, Serial Number: 5CG24632GR;

Black Acer Aspire Laptop, Model Number: MS2309, Serial Number: LXPY90200101803BDF2000;

Black Acer Aspire laptop with "Limited Addition" placard on top, Model: Aspire 5336-2524, Serial Number: LXR4G020600357CE3C1601;

Black HP Pavilion Laptop with multiple stickers on front, Serial Number: 5CD33634C0; and

Silver Apple Laptop with multiple stickers on front, Model Number: A1278, Serial Number: C02GT18HDV17;

2. Two (2) Evolis Dualys 3 card printers bearing serial number DU08410108476 and serial number D72166166;
3. HP printer/scanner;
4. Canon Printer Pixma MX 493;
5. Evolis card feeder/hopper for Evolis Dualys 3 printer;
6. Dualys Pebble 4 Driver compact discs;
7. Evolis Hightrust Yellow, Magenta, Cyan, and Black printer tape/ribbon;
8. gold printer tape/ribbon imprinted with document security features;
9. silver printer tape/ribbon imprinted with document security features;
10. holographic overlay ribbons containing images of Genuine Globe security features;
11. identification card-sized transparent adhesives; and
12. 300 blank Zebra brand PVC identification cards

with the intent such document making implements and authentication features would be used in the production of a false identification document that will be so used, and the possession of the authentication feature and document making implement was in or affected interstate or foreign commerce; all in violation of Title 18, United States Code, Section 1028(a)(5).

COUNT 3

(False Statement or Claim of Citizenship with Intent to Obtain a Benefit)

The Grand Jury further charges:

Between on or about November 24, 2009 and on or about October 27, 2017, in the Northern District of Ohio, Western Division, and elsewhere, the exact dates unknown to the Grand Jury, Defendant MARTHA BUENDIA-CHAVARRIA, knowingly made false statements and claims that she was, or at any time had been, a citizen or national of the United States, with the intent to obtain on behalf of herself or any other person, a Federal or State benefit or service, to wit: an

Ohio Driver's license and state ID issued in the name of T.M.; all in violation of Title 18, United States Code, Section 1015(e).

COUNT 4
(Aggravated Identity Theft)

The Grand Jury further charges:

Between on or about November 24, 2009, and on or about October 27, 2017, in the Northern District of Ohio, Western Division, and elsewhere, Defendant MARTHA BUENDIA-CHAVARRIA, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: False Statement or Claim of Citizenship with Intent to Obtain a Federal or State Benefit in violation of Title 18, United States Code, Section 1015(e), knowingly transferred, possessed and used, without lawful authority, the means of identification of one or more other individuals, to wit: the name, date of birth, and social security number of T.M. (whose name is known to the Grand Jury), knowing that said means of identification belonged to another person; all in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.